

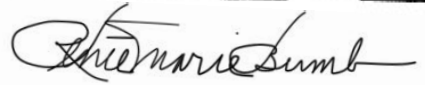


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December 12, 2024

By ECF

The Honorable Renée Marie Bumb
Chief, United States District Judge
United States District Court
District of New Jersey
4th & Cooper Streets, Room 1050
Camden, New Jersey 08101

SO ORDERED this 12th day
of December 20 24

United States District Judge

Re: Paucek v. Shaulis, Index. No. 1:24-cv-09807

Dear Chief Judge Bumb:

I represent the Defendant in the above-entitled action. I write jointly with the Plaintiffs to respectfully request that the deadlines set by the court's order of December 4th (Dkt. No. 18), including the December 24, 2024 Counterclaim response deadline, the December 31, 2024 Joint Discovery Plan deadline, and the initial scheduling conference scheduled by telephone with Magistrate Judge Ann Marie Donio for January 7, 2025, be adjourned until after the Court rules on the Defendant's motion to dismiss the proceeding. This is the parties' first request for an extension.

By way of brief background, the causes of action in the Complaint, filed on October 15, 2024, are defamation and tortious interference with business relations, both arising from Defendant's allegedly defamatory writings. By letter dated November 6, 2024, Defendant requested permission to file a motion to dismiss based on New Jersey's new anti-SLAPP statute. By letter dated November 14, 2024, Plaintiffs opposed, arguing that New Jersey law cannot apply to this dispute and that the New Jersey anti-SLAPP statute cannot be heard in federal court. On November 21, 2024, the Court ordered briefing on those topics, which is to be completed by February 10, 2025. (Dkt. No. 15.) After the Court rules on the foregoing preliminary issues, the Defendant will move to dismiss the proceeding, whether by New Jersey anti-SLAPP relief or otherwise.

Given the significant expense associated with discovery, and the purely legal nature of the foregoing briefing, the parties jointly and respectfully request that the Court adjourn the pleading deadlines and initial scheduling conference until after the Court rules on Defendant's motion to dismiss.

Very truly yours,

/s/ Adam Pollock
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cc: Magistrate Judge Ann Marie Donio